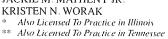
W. DAVID DENTON
THOMAS J. KEULER
WILLIAM E. PINKSTON
LISA H. EMMONS
DAVID L. KELLY
THEODORE S. HUTCHINS*
GLENN D. DENTON*
STACEY A. BLANKENSHIP
MELISSA D. YATES*
NEAL D. OLIPHANT
DOUGLAS R. MOORE
ROBERT W. GOFF**
JACKIE M. MATHENY JR.
KRISTEN N. WORAK





ATTORNEYS AT LAW
A Limited Liability Partnership

PADUCAH BANK BUILDING SUITE 301 555 JEFFERSON STREET P.O. BOX 929 PADUCAH, KENTUCKY 42002-0929 TELEPHONE (270) 443-8253

FACSIMILE (270) 442-6000

REAL ESTATE FACSIMILE (270) 442-6034

MAR 29 2013

PUBLIC SERVICE COMMISSION

WEB SITE www.dklaw.com

March 28, 2013

<u>VIA FEDERAL EXPRESS</u> TRACKING NO. 8996 0543 2653

MR JEFF DEROUEN EXECUTIVE DIRECTOR KENTUCKY PUBLIC SERVICE COMMISSION 211 SOWER BLVD. FRANKFORT KY 40602

Re: Kentucky Public Service Commission; Case No. 2012-00572

Kentucky Public Service Commission; Case No. 2013-00052

Dear Mr. Derouen:

Please find enclosed, the original plus ten (10) copies of Jackson Purchase Energy Corporation's Notice of Filing of Affidavits of Publication in regard to Kentucky Public Service Commission Case No. 2012-00572.

Additionally, please find enclosed, the original plus ten (10) copies of Jackson Purchase Energy Corporation's Corrected Response to Commission Staff's First Requests for Information, Number 13(b) in regard to Kentucky Public Service Commission Case No. 2013-00052.

If you have any questions or comments, please do not hesitate to call.

Sincerely,

Melissa D. Yates

Attorney for Jackson Purchase Energy Corporation

Jelissa D. Gatin

158669

COMMONWEALTH OF KENTUCKY

	ig.
MAR 20033	
PUBLICATA COMMENTAL	

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ROY G. COLLINS)	
)	
COMPLAINANT)	
) CASE NO	١.
V.) 2013-0005	2
)	
JACKSON PURCHASE ENERGY)	
CORPORATION)	
)	
DEFENDANT)	

JACKSON PURCHASE ENERGY CORPORATION'S <u>CORRECTED</u> RESPONSE TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION, NUMBER 13(B), DATED MARCH 13, 2013

COMES Jackson Purchase Energy Corporation (hereinafter "JPEC") by and through the undersigned counsel, and submits herein its **Corrected** Response to Commission Staff's First Request for Information, Number 13(b), dated March 13th, 2013. JPEC's complete response to 13(b) was inadvertently omitted from its Responses to Commission Staff's First Request for Information, dated March 13, 2013 and received by the Public Service Commission on March 27, 2013

13. In the Complaint and in his letter to JPEC dated December 14, 2012, contained in Exhibit 3 to the Complaint, Complainant explains that the subject property is "equipped with central heating and air that will be used year-round for climate control regardless of whether or not the building is occupied." Section 4, Rules and Regulations, Item 32, part A, of JPEC's tariff, as cited in its Answer, states the following: "This rule shall apply to services where the amount of consumption and/or the permanency of service cannot be reasonably assured as determined by JPEC."

Given the dimensions of the subject property as claimed by Complainant, does b. JPEC believe the amount of consumption needed to climate control the building would be sufficient to re-classify the subject property as permanent?

Corrected Response: Mr. Collins represented he expects to be in the property about 30 days a year. Therefore, JPEC determined, at the time of classification, the amount of consumption could not be reasonably assured. Mr. Collins statements that the building will be climate controlled year round, regardless of occupancy, cannot be verified. Further, JPEC states that it does not believe climate control and square footage determine the appropriate classification under the tariff.

Witness: Scott W. Ribble, Vice President of Engineering & Operations

Respectfully submitted,

DENTON & KEULER

P.O. BOX 929

PADUCAH, KY 42002-0929

Telephone: Facsimile:

(270) 443-8253 (270) 442-6000

By:

ATTORNEY FOR JPEC

I hereby certify that the foregoing has been served by mailing a true and correct copy to:

MR JEFF DEROUEN KENTUCKY PUBLIC SERVICE COMMISSION 211 SOWER BLVD FRANKFORT KY 40602 Via Fed-Ex

MR ROY G COLLINS 109 DICKENSON STREET **MANCHESTER KY 40962**

Via U. S. Postal

day of March, 2013.